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14 *Attorneys for Defendants Panasonic Corporation  
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16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 IN RE OPTICAL DISK DRIVE  
20 PRODUCTS ANTITRUST LITIGATION

21 MDL Docket No. 3:10-md-02143-RS-JCS

22 This document relates to:

23 Case No.: 3:13-cv-05372-RS-JCS

24 Ingram Micro Inc., et al.,

25 Plaintiffs,  
26 v.  
27 LG Electronics, Inc., et al.,  
28 Defendants.

**DEFENDANTS PANASONIC  
CORPORATION'S AND PANASONIC  
CORPORATION OF NORTH  
AMERICA'S AND PLAINTIFFS  
INGRAM MICRO INC.'S AND  
SYNTEX CORP.'S STIPULATION TO  
AND [PROPOSED] ORDER FOR  
DEADLINES FOR INGRAM MICRO.  
INC'S AND SYNTEX CORP.'S FINAL  
PRODUCTION OF DOCUMENTS  
AND SUPPLEMENTAL RESPONSES  
TO INTERROGATORIES**

29 Hon. Richard Seeborg  
30 Hon. Joseph C. Spero, Magistrate Judge

1  
2 WHEREAS, Defendant Sony Corporation served Plaintiffs Ingram Micro Inc. (“Ingram”)  
3 and SYNTEX Corporation (“SYNTEX”) (collectively, “Plaintiffs”) with its first set of  
4 interrogatories and requests for production (collectively, “Sony Requests”) on April 4, 2016;

5 WHEREAS, Plaintiffs and Defendant Sony Corporation agreed to search terms and  
6 custodians in response to the Sony Requests on or around August 11, 2016;

7 WHEREAS, following confirmation from SYNTEX that one of the custodians previously  
8 negotiated with Sony did not hold a relevant position during the Relevant Time Period, and none  
9 had any responsibility for purchasing ODD Products during the Relevant Time Period, Defendants  
10 Panasonic Corporation and Panasonic Corporation of North America (collectively, “Panasonic”)  
11 requested three replacement document custodians from SYNTEX in response to the Sony Requests  
12 on or around October 13, 2016;

13 WHEREAS, Panasonic served Plaintiffs with its first set of contention interrogatories (the  
14 “Interrogatories”) and requests for production (the “Requests”) on August 30, 2016;

15 WHEREAS, Plaintiffs served responses and objections to the Interrogatories on October 3,  
16 2016;

17 WHEREAS, Panasonic and Plaintiffs met and conferred to discuss Panasonic’s position that  
18 Plaintiffs’ responses to the Interrogatories were not sufficient, and Plaintiffs agreed to provide  
19 substantive answers by Friday, October 28, 2016;

20 WHEREAS, Plaintiffs requested a provisional extension for their responses to Interrogatory  
21 Nos. 21, 22, and 23 to November 4, 2016, and Panasonic agreed to entertain a request for an  
22 extension to November 4, 2016 upon good cause shown for any delay;

23 WHEREAS, Ingram served its supplemental responses to all Interrogatories on Friday,  
24 October 28, 2016, and SYNTEX served its supplemental responses to Interrogatory Nos. 1 through  
25 20 on October 28, 2016;

26 WHEREAS, SYNTEX served its supplemental responses to Interrogatory Nos. 21, 22, and

1 23 on November 11, 2016;

2 WHEREAS, Plaintiffs have agreed to provide further supplemental responses to the  
3 Interrogatories;

4 WHEREAS, Panasonic and Plaintiffs agreed that Plaintiffs would respond to the Requests  
5 (including the Sony Requests) through a rolling production of documents with a final production  
6 deadline of November 4, 2016;

7 WHEREAS, SYNNEX's production of documents from the files of one new document  
8 custodian requested by Panasonic on or around October 13, 2016 was not complete as of November  
9 18, 2016;

10 WHEREAS, Panasonic and Plaintiffs met and conferred on November 18, 2016 concerning  
11 Plaintiffs' supplemental interrogatory responses, document productions and depositions;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned  
13 counsel for the parties, that:

14 1) By Wednesday, December 7, 2016, Plaintiffs will provide full and complete supplemental  
15 Interrogatory responses, based on information currently available to Plaintiffs, including a  
16 response to Interrogatory Nos. 1, 5, 6, 8, 10, 16, 21, and 22; and  
17 a. With respect to Interrogatory No. 1, Plaintiffs will include a chart or list of any specific  
18 meetings referenced in Paragraph 122 of Plaintiffs' Amended Complaint (ECF No.  
19 1298);  
20 2) If Panasonic does not find those supplemental Interrogatory responses to be satisfactory, the  
21 parties will have a final meet-and-confer, and, if necessary, will exchange initial motion to  
22 compel inserts no later than Wednesday, December 21, 2016 with an exchange of final inserts  
23 the following day; and  
24 3) SYNNEX will conclude its final production to Panasonic of any documents for any and all  
25 custodians with responsive documents to the Requests (including the Sony Requests) by  
26 Friday, December 2, 2016.

1           4) In the event that the parties are unable to confirm deposition dates for Plaintiffs' and  
2           Panasonic's fact and 30(b)(6) witnesses prior to the close of fact discovery on December 9,  
3           2016, the parties agree that depositions of Ingram Micro and SYNNEX requested by  
4           Panasonic or other Defendants, and the fact and 30(b)(6) depositions of Panasonic requested  
5           by Ingram Micro and SYNNEX, will occur following the close of fact discovery at times  
6           mutually agreed to by the parties.

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8           DATED: November 23, 2016  
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35           Attorneys for Plaintiffs Ingram Micro Inc. and Synnex  
36           Corporation

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2 **IT IS SO ORDERED.**  
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5 Dated: 12/8/16  
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Hon. Richard Seeborg  
United States District Judge